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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD KOZUSKO,

Defendant.

I N F O R M A T I O N

4:12CR0126

CASE NO. _____

Title 29, Section 501(c)
United States Code

JUDGE GWIN

COUNT 1

The United States Attorney charges:

1. At all times relevant to this Information, the American Postal Workers Union, Local 443 ("the Union"), located in Youngstown, Ohio, was a labor organization engaged in an industry affecting commerce, within the meaning of Sections 402(i) and (j) of Title 29, United States Code.

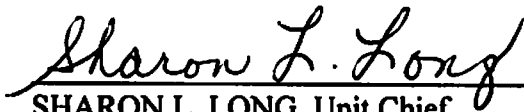
2. At all relevant times to this Information, the defendant, EDWARD KOZUSKO, was the Treasurer of the Union. In that position, he was entrusted with the responsibility for maintaining the integrity of the funds belonging to the local union. The defendant maintained the check book for the Union's checking account and a Union-issued American Express credit card.

3. During the time period stated below, the defendant knowingly misused his position as Treasurer of the Union to unlawfully obtain, for his own personal benefit, assets of the Union to which he was not entitled, through various devices, including: issuing 32 checks payable to himself without authorization in the aggregate amount of \$7,418.46 and making approximately 88 unauthorized cash withdrawals or charges for non-Union related expenses by using his Union issued American Express credit card, which totaled, including the associated fees, \$5,194.74.

4. From on or about August 16, 2008, through on or about February 16, 2010, in the Northern District of Ohio, Eastern Division, the defendant, EDWARD KOZUSKO, while an officer, that is, Treasurer, of the Union, did embezzle, steal and unlawfully and willfully abstract and convert to his own use and the use of another the moneys, funds, and assets of said labor organization in the approximate amount of \$12,613.20.

In violation of Title 29, United States Code, Section 501(c).

STEVEN M. DETTELBACH
United States Attorney

By: 
SHARON L. LONG, Unit Chief
Major & Cyber Crimes Unit